

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION

PATRICIA PORTER KRYDER, )  
Plaintiff, )  
v. )  
JAMES KEMMLER ROGERS and )  
JENNIFER ROGERS-ETCHEVERRY, )  
Defendants. )  
\_\_\_\_\_  
JENNIFER ROGERS-ETCHEVERRY, as )  
attorney-in-fact for JAMES KEMMLER )  
ROGERS, an incapacitated person, )  
Counter-Plaintiff, )  
v. )  
PATRICIA PORTER KRYDER )  
a/k/a PATRICIA K. GANIER, )  
Counter-Defendant. )

No. 1:13-cv-00048  
JURY DEMAND

*DARRELL  
This motion  
is GRANTED and it is P  
R 15(a)  
JUL 31 2014  
DARRELL  
7-31-14*

MOTION FOR LEAVE TO FILE  
SECOND AMENDED ANSWER AND COUNTERCLAIM

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Counter-Plaintiff Jennifer Rogers-Etcheverry (“Counter-Plaintiff” or “Etcheverry”), by and through undersigned counsel, respectfully moves this Court for leave to file a Second Amended Answer and Counterclaim. Justice so requires the filing of a Second Amended Answer and Counterclaim for reasons including, but not limited to, the following: to amend and clarify Counter-Plaintiff’s claims for breach of contract, equitable lien, declaratory judgment and lien lis pendens, and to amend and clarify certain relief sought under said causes of action against Counter-Defendant. More